

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

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|---------------------------|---|------------------------------|
| UNITED STATES OF AMERICA, |) | No. CR18-092-RAJ |
| |) | |
| Plaintiff, |) | SUPPLEMENTAL EXHIBITS IN |
| |) | SUPPORT OF DEFENSE MOTION TO |
| v. |) | COMPEL PRETRIAL INTERVIEWS |
| |) | OF CASCADE CAPITAL GROUP |
| BERNARD ROSS HANSEN, |) | GOVERNMENT WITNESSES |
| |) | |
| Defendant. |) | |
| |) | |
| |) | |

Bernard Ross Hansen moved to compel key government witnesses from the Cascade Capital Group, LLC, to participate in a pretrial interview with the defense. Dkt. 98. As noted in the motion and reply brief, the analysis and work undertaken by the Cascade Capital Group government witnesses is the foundation of the government's case against Mr. Hansen (and his co-defendant Diane Erdmann) that the Northwest Territorial Mint was, in essence, a Ponzi-scheme. *Id.* at 4-8; *see also* Dkt. 118 at 2-3. The defense has described these witnesses as essentially quasi-agents of or experts for the government. In further support of that contention, the defense submits the government's July 3, 2019 and August 9, 2019 expert disclosure notices.

DATED this 7th day of October, 2019.

Respectfully submitted,

s/ Dennis Carroll

s/ Andrew Kennedy

s/ Jennifer E. Wellman

Attorneys for Bernard Ross Hansen

CERTIFICATE OF SERVICE

I certify that on October 7, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of filing to all registered parties.

s/ Barbara Hughes
Paralegal